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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

XUEDAN WANG, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

THE HEARST CORPORATION,

Defendant.

12 Civ. 0793 (HB)

**NOTICE OF CROSS-MOTION FOR CONDITIONAL CERTIFICATION AND COURT-
AUTHORIZED NOTICE PURSUANT TO SECTION 216(b)**

For the reasons set forth in Plaintiff's Memorandum of Law in Opposition to Defendant's Motion to Strike the Class and Collective Action Allegations and in Support of Plaintiff's Cross-Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) and in the Declaration of Rachel Bien and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order:

- (1) Conditionally certifying the following collective pursuant to 29 U.S.C. § 216(b) and authorizing notice to be issued:

All persons who have worked as unpaid or underpaid interns at Hearst Magazines between February 1, 2009 and the date of final judgment in this matter.

- (2) Ordering the parties to meet and confer on the form of a proposed Court-Authorized notice; and
- (3) Ordering Hearst to produce a computer-readable data file containing the names, last known mailing addresses, last known telephone numbers, last known email addresses, and internship start and end dates for all collective members.

Dated: June 7, 2012
New York, New York

Respectfully submitted,

By: /s/ Rachel Bien
Rachel Bien

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